

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS HOLDINGS, et al.,

Debtors.

Chapter 11

Case No. 08-13555-scc

**STIPULATION AND ORDER REGARDING BRIEFING
SCHEDULE ON MOTIONS TO VACATE ALTERNATIVE
DISPUTE RESOLUTION PROCEDURES ORDER
FOR INDEMNIFICATION CLAIMS OF THE DEBTORS
AGAINST MORTGAGE LOAN SELLERS**

WHEREAS, on February 17, 2015, Defendant Stearns Lending LLC f/k/a Stearns Lending Inc. (“Stearns”) filed a Motion Pursuant to Rule 60(b)(6) of the Federal Rules of Civil Procedure Seeking an Order Vacating the “Alternative Dispute Resolution Procedures Order for Indemnification Claims of the Debtors Against Mortgage Loan Seller, Stearns Lending LLC, f/k/a Stearns Lending Inc” with a hearing date of March 17, 2015;

WHEREAS, on March 30, 2015, Defendant Oaktree Funding Corporation (“Oaktree”), Gateway Bank FSB (“Gateway”) and American Bank (“American Bank”) filed a Motion Pursuant to Rule 60(b)(6) of the Federal Rules of Civil Procedure Seeking an Order Vacating the Alternative Dispute Resolution Procedures Order for Indemnification Claims of the Debtors Against Mortgage Loan Seller requesting a stay and a hearing date of May 5, 2015;

WHEREAS, on March 30, 2015, Defendant Group 2000 Real Estate Services Inc. (“Group 2000”) filed a Motion Pursuant to Rule 60(b)(6) of the Federal Rules of Civil Procedure Seeking an Order Vacating the Alternative Dispute Resolution Procedures Order for Indemnification Claims of the Debtors Against Mortgage Loan Seller; (Stearns, Directors,

Republic, First Mortgage, Oaktree, Group 2000, Gateway, and American Bank, together, the “Defendants”) and the Defendants’ Motions, together, the “Motions to Vacate”);

WHEREAS, on March 31, 2015, Defendant Directors Mortgage (“Directors”), Republic State Mortgage (“Republic”), and First Mortgage Corporation (“First Mortgage”) each filed a Motion Pursuant to Rule 60(b)(6) of the Federal Rules of Civil Procedure Seeking an Order Vacating the Alternative Dispute Resolution Procedures Order for Indemnification Claims of the Debtors Against Mortgage Loan Seller requesting a stay and a hearing date of May 5, 2015;

WHEREAS Defendants and LBHI have conferred and agreed to a consolidated briefing schedule for Defendants’ Motions to Vacate;

THEREFORE IT IS HEREBY STIPULATED AND AGREED, by and between LBHI and Defendants, by their respective and undersigned counsel, as follows:

1. The deadline for LBHI to oppose the Motions to Vacate is April 14, 2015;
3. The Defendants’ time file a reply in further support of the Motions to Vacate is April 30, 2015; and
4. The Court will hear arguments on the Motions to Vacate on May 5, 2015 at 2:00 p.m.

Dated: March 31, 2015

s/ Adam M. Bialek
William A. Maher
Paul R. DeFilippo
James N. Lawlor
Adam M. Bialek
Wollmuth Maher & Deutsch LLP
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050

s/ Evans Prieston_____
Evans Prieston
Tracy L. Henderson
(*Pro Hac Vice Pending*)
American Mortgage Law Group, P.C.
75 Rowland Way, Suite 350
Novato, California 94945
Facsimile: (415) 878-0035
Telephone: (415) 878-0030

*Attorneys for Directors Mortgage Company,
Republic State Mortgage, First Mortgage*

-and-

*Corporation, Oaktree Funding Corporation,
Gateway Bank and American Bank*

s/ Michael A. Rollin
Michael A. Rollin
Maritza Dominguez Braswell
Jones & Keller, P.C.
1999 Broadway, Suite 3150
Denver, Colorado 80202
Telephone: (303) 573-1600
Facsimile: (303) 573-8133

Counsel for Lehman Brothers Holdings Inc.

s/ Timothy Wm. Salter
Jill E. Alward
Timothy Wm. Salter
Blank Rome LLP
The Chrysler Building
405 Lexington Ave.
New York, New York 101175
Telephone: (212) 885-5000
Facsimile: (212) 885-5001

*Counsel for Stearns Lending LLC f/k/a
Stearns Lending Inc. and Group 2000 Real
Estate Services Inc.*

IT IS SO ORDERED:

New York, New York

_____, 2015

/s/ _____
HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE